

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No:

RAZIEL OFER, )

)

Plaintiff, )

vs. )

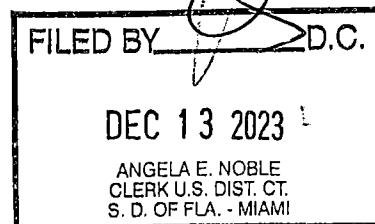
)

LAUREL ISICOFF, )

)

Defendant. )

/



COMPLAINT

PLAINTIFF RAZIEL OFER, PRO SE, hereby files the instant Complaint against United States Bankruptcy Court Judge Laurel Isicoff, and in support thereof proffers the following facts and evidence (I file it PRO SE, but it was partially prepared and reviewed by two lawyers practicing Law mainly in District Court and was reviewed by one of America's top Lawyers).

*"The Government of the United States, which gives to bigotry no sanction, to persecution no assistance, requires only that those who live under its protection, should demean themselves as good citizens."*

1. These words of George Washington adorn the facade of the National Museum of American Jewish History in Philadelphia. These words are not aspirational, but rather enforceable rights. Plaintiff, the Jewish son of Holocaust survivors and an immigrant to this country from Israel, brings this lawsuit to enforce his rights under the Constitution and laws of the United States. This is mainly a case of gross Antisemitism by Judge Isicoff, a Federal Judge, which goes a long way to conceal her corrupt cooperation with the other party.

I ask the Court to carefully review **Exhibit 1**, a motion to recuse Judge Isicoff, which defendants has been refusing to upload to the docket and rule on it, in an attempt to deprive me from my constitutional rights of appeal. It contains many details and other critical exhibits relevant to this

complaint.

**NATURE OF THE ACTION**

2. This is a Title 42 U.S. Code § 1983 federal civil rights case under the First and Fourth Amendments of the United States Constitution as applied to the States under the United States Constitution's Fourteenth Amendment for the Defendants' individual and collective unlawful violations under color of state and federal law of Plaintiff's constitutional rights to free speech, civil rights and protection against unreasonable search of Plaintiffs' bodies as well as state and federal tort claims for civil conspiracy to steal, civil theft, Anti Semitism, baseless and illegal threats, threats on my Lawyers, refusal to take action against her partners for the sworn Antisemitic affidavits and refusal to listen to a legal recording of the other party (her business partners), a tape which was recorded at a public place and is therefore legal, in which they implicate Isicoff in their criminal activities and admit that they committed a grand theft. The Antisemitic affidavits were designed to make it clear that Jews are not welcome in Miami, as they own too many properties, these affidavits call for the confiscation of Jews properties. The main purpose was to scare me to a point that I would let them steal \$50M without a 'fight'.

New information discovered last week shows the defendant was aware that a former disgraced Circuit Court Judge, who was removed from the bench, Stephen Millan, was providing Roniel Rodriguez and Stuart Kalb, Isicoff's partners, with information and documents I had given him when I met with him with a view of retaining him. Isicoff and her partners knew that these documents were used by them to steal from me \$50M. Stephen Millan is now close to a point of cooperating with me against Isicoff and her partners, he would do it as he's aware that he'll now be disbarred and potentially face criminal prosecution. He'll be a witness at the trial.

3. Defendants committed these unlawful violations of Plaintiff's constitutional, federal and state rights

under color of federal and state law in bad faith and with malicious purpose in reckless, wanton, and willful disregard of Plaintiff's free speech, civil rights, due process and property rights.

#### **JURISDICTION AND VENUE**

4. Plaintiff brings this action pursuant 42 U.S.C. § 1983 for violations of civil rights under the First and Fourteenth Amendments to the United States Constitution.

5. This Court has subject-matter jurisdiction over this matter pursuant to 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1333(a)(3) (civil rights); 28 U.S.C. § 1337 provides supplemental jurisdiction over the federal and state law tort claims that arose from the same common nucleus of facts. Venue is proper in the Southern District of Florida pursuant to 28 U.S.C. § 1333(b).

6. Defendants' independent and collective malicious and unlawful violations under color of state law of Plaintiff's constitutional rights giving rise to the claims herein accrued within this district.

7. At all material times, Defendant committed these unlawful violations under color of federal and state law in bad faith and with malicious purpose in reckless, wanton, and willful disregard of Plaintiff's due process, speech and property rights.

8. These constitutional law violations are "capable of repetition, yet evading review." *Roe v. Wade*, 410 U.S. 113, 125 (1973) (citing *Southern Pacific Terminal Co. v. ICC*, 219 U. S. 498, 515 (1911), *Moore v. Ogilvie*, 394 U. S. 814, 816 (1969), *Carroll v. Princess Anne*, 393 U. S. 175, 178-179 (1968), *United States v. W. T. Grant Co.*, 345 U. S. 629, 632-633 (1953)).

#### **PARTIES**

9. Plaintiff Raz Ofer is a Florida resident residing within this Court's jurisdiction and otherwise sui juris.

10. Defendant Laurel Isicoff is a Federal Court Judge in Miami-Dade County, a Florida resident residing within this Court's jurisdiction and otherwise sui juris.

#### **FACTUAL ALLEGATIONS**

11. Plaintiff owns the property located at 1560 Drexel Ave & 1568 Drexel Avenue, Miami Beach,

which I purchased for \$4 Million Dollars, in cash, in 2013. Plaintiff also owns 942 Pennsylvania Ave, Miami Beach, a building I bought in 2017 in cash. The two buildings are valued around \$40M.

12. Due to gross corruption by Judge Carlos Guzman, 11th Circuit Court Judge, I filed for chapter 11, not realizing Judge Isicoff is also involved with the same group of people, who seem to operate like a Mafia for over 20 years. This fact was confirmed to me by Alan Dershowitz, one of America's top lawyers. As far as 942 Pennsylvania Ave, Miami Beach, there was a small loan taken by the former owner which turned out I had to pay. This loan to the former owner was a usury and I could have cleared it in State Court. However, the BK Lawyer I used for Drexel persuaded me to let him deal with it in BK Court, as Isicoff is his friend for 25 years and he goes drinking whisky with her husband. My other lawyers warned him not to file for chapter 11, as a trustee might be appointed and they'll just take the building. One of my lawyers, I won't mention names, but he's a personal lawyer of Squares, the Miami Mayor, called this lawyer and told him, also by email, not to file for chapter 11, due to the above, saying the building is worth \$18M with \$250K in alleged debt. This lawyer, Isicoff's friend for 25 years, did file for chapter 11, ignoring my other lawyers. Within a few days Isicoff appointed her friend, Barry Mukamal, as a trustee. When I realized it, I told my Lawyer, this was after about 7 days, to immediately file a motion to dismiss the BK. Of course, Isicoff denied the motion without any reason, although I offered to put \$2M in escrow. Isicoff knew that if the trustee sold the building to their friend, they'd make \$18M and I'd be left without a penny. I'll present the evidence against Isicoff, including proof she received bribes. On a separate note, the Lawyer who filed for chapter 11 is about to be disbarred, he also stole my CC and spent \$45K in a shopping spree by forging my signature. Isicoff still awarded him record fees. In fact, it's clear that this Lawyer, Mark Roher, will be disbarred.

13. Defendant ignored Antisemitic affidavits made by her partners in crime about me, such as Jews, like me, own too many properties and Jews properties need to be confiscated. When I filed a secret recording on the docket, done in a public place, so it's legal, Isicoff threatened me that I committed a felony as it's illegal to record in Florida. I said it's legal, as it was recorded in a public place, she

ignored it. The recording which is attached, mentions Laurel Isicoff name before I even filed for chapter 11, the other party admit in this recording that they committed a grand theft by forging a deed to Drexel, which they filed with Property Appraiser.

14. At that time, the recording was already with the FBI, so any talk that it was illegal recording is pure nonsense. Isicoff threatened me that if I show the recording or mention it to anyone then she'll make sure that I'm charged with Felony...I answered her that if anything, she is committing an extortion, as she wants to make sure that the recording isn't in the public domain as she's implicated by this recording. An extortion is a felony in the second degree. When she heard what I said about the recording, she immediately asked for a break, I assume she called someone for advice.

15. When she came back she was very nice, trying to make me believe she's my friend, so that I don't use the tape, she didn't realize the FBI already had the recording. When I mentioned to her the **Antisemitic affidavits**, she responded that she read it, she added that I'm not allowed to discuss it with anyone nor to show it, as she knows the people that made the **Antisemitic affidavits**. I said that **Antisemitism** is criminal and she must take action, she said she won't and said I can't mention it anymore or she'll sanction me. Exhibit 2 is a National Security order signed by President Biden, in May 23, clarifying the criminal nature of Anti Semitism. The defendant seems not worried by the National Security order as she believed she's above the Law.

I felt so bad that on the way back from Court that I lost my consciousness. It was so traumatic that I still need medical treatments by a Neurologist, see the attached recusal motion.

16. As below, I'm seeking financial damages from her for this and other corrupt actions. I'll prove in trial that Isicoff received \$2M in bribes from the other party, not to mention that the \$40M in equity has disappeared and I didn't receive even a single penny. I also claim, as below, \$10M in damages. All the above is backed up by the transcripts which I'll present at trial.

I ask that the Court carefully read my **recusal motion**, which Isicoff refuses to upload to the docket or rule on it, so that I can't appeal it. Appeal is a constitutional right which I'm now denied.

She also refuses to comply with my public request for information, which is a breach of due process. Everything she does is in the name of money. When I informed her that she's under criminal investigation by the FBI, the next day she asked to commence a financial investigation about me, she didn't realize she was being followed and that I was informed about it, she was tampering with criminal investigation.

I'll ask an FBI special agent, who is involved with the investigation, to testify at the trial, in closed doors.

I would add that when I informed the FBI about her actions, they looked at their system and said they could see a 'thunderstorm' of complaints about her, one that she stole \$60M.

17. Apparently the FBI doesn't investigate every complaint, but now that I brought it up, they're conducting a thorough investigation, they're making progress, however, it's a long investigation. She knows about it, as at one point, at the end of the hearing, everybody left, I was picking up my papers, she was waiting so that she can speak only with me, she said 'what you did last week (FBI) isn't going to help you, the opposite, so she was threatening me to stop it or she would fight me. I always discussed this case with Alan Dershowitz, he told me that he heard about her and her Court corruption for many years. He was furious when he read the Antisemitic affidavits, saying she'll no longer be a Judge and no Judge can dismiss a case that, among other things, deals with **Anti Semitism**. When I informed her that Dershowitz is coming to the next hearing, it was in 2 days time, I said he wants to know what type of investigation she instigated regarding the Antisemitic affidavits. Within 5 minutes she sent a notice canceling the hearing and moved it to another Judge in WPB, who knew nothing about the case or the affidavits. She was terrified to see Dershowitz in her Courtroom, knowing the media would be waiting for him outside the Courtroom to find out why he came to Court. The Judge she transferred it to was Judge Kimball, the new chief Judge. Sorry for my language, he acted like a parrot and just repeated what she had told him to say.

18. Judge Isicoff also ignored ex-parte emails which I filed on the docket, between the other party (Isicoff's partners and Judge Guzman (Circuit Court), some emails have criminal implications. These ex-parte emails are between Roniel Rodriguez, Stuart Kalb and Melanie Damian (sister of magistrate Judge Melissa Damian). In these emails, Rodriguez and Kalb are attaching a proposed order to hold me in criminal contempt for allegedly missing a discovery deadline, of course I missed no deadline. They

requested Melanie Damian to get Judge Guzman to sign their proposed criminal order, which he did without changing a word.

19. I immediately emailed Guzman with a copy of the ex-parte email, saying I'm going to file a police complaint against him, needless to say that he vacated the order within a few minutes. Isicoff refused to review these ex-parte emails which were the basis to all corrupt State Court orders. At the same time, she said she can't review State Court decisions, even when I provided evidence such as the ex-parte emails. Her motive was the bribes she was getting from the people that were involved with the ex-parte emails. Without the State Court 'decisions', the case would have never got to the defendant. A former disgraced judge, who was removed from the Bench, Stephen Millan, is now prepared to talk about the involvement of his former colleagues (Isicoff's partners). Millan met with me in his office (which turned out to be Rodriguez's office) with a view of me retaining him, he now confirmed that all the information and documents I gave him ended up with Rodriguez, who used it against me in State Court and in front of the defendant. I've evidence that the defendant was aware of it, hence she refuses to comply with the public request for information, as it includes all her emails, etc.

20. I sued Judge Guzman personally in District Court, miraculously Magistrate Judge Damian was appointed in this case.. I immediately requested she recuse herself, as her sister in law is implicated with criminal ex-parte emails, of course she denied it and continued to be involved with the case for some three (3) three months, reviewing motions from both parties. It was only after about three (3) months and after she dismissed the case with prejudice, that all of a sudden she recused herself....I was saddened to see that some District Court Judges, although junior ones, are also corrupt. I know that the vast majority of District Court Judges are super honest and impartial, they are among the best Judges in the US.

21. As a litigant, Plaintiff Ofer had a right to due process via the Fifth Amendment to an unbiased judge in both cases before Judge Isicoff. He also had a separate right to Due Process under the Fourteenth Amendment to the United States Constitution, which provides, in relevant part:

22. No State or Federal Judge shall make or enforce any law which shall abridge the privileges or

immunities of citizens of the United States; nor shall any State or Federal Judge deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

23. Defendant Laurel Isicoff has breached all the above Statutes, Laws and the constitution as follows:

23.1 Free speech - By threatening me not to discuss or show the legal Recording in which she's implicated in criminal activity and theft.

23.2 Civil Rights - By threatening me with a Felony charges if I mention or discuss the contents of the recording and the Antisemitic affidavits.

23.3 Cooperating and spreading **Anti Semitism** which is a serious criminal offense. See attached President Biden National Security order signed in May 2023.

23.4 Breach of Property Laws - Helping the other party confiscate 3 buildings of mine worth \$40M plus damages of \$10M.

23.5 Breach of Due Process - By refusing to upload my motions to the docket, including a recusal motion and a Public Request for information (to have sight of her emails with all parties involved).

23.6 Breaches of the constitution - By refusing to upload my motions and rule on them she denied my constitutional rights to appeal.

24. Defendant Isicoff arranged for the judicial sale of the Properties, which were eventually sold to persons who were working in concert with the Trustee and Isicoff. Isicoff had private deals with this broker before and was friendly with his Father, I'll prove it at trial.

25. Normally, Defendants Judge Isicoff would be cloaked in judicial immunity. However, the Fifth Circuit held in *Harper v. Merckle*, 638 F.2d 848 (5th Cir. Unit B), cert. denied 454 U.S. 816, 102 S.Ct. 93, 70 L.Ed.2d 85 (1981), that the doctrine of judicial immunity does not apply when "a judge has acted out of personal motivation and has used his judicial office as an offensive weapon to vindicate personal objectives.... These nonjudicial acts, to state the obvious, are not cloaked with judicial immunity from suit under § 1983."

26. Moreover, the Supreme Court stated in *Pulliam v. Allen*, 466 U.S. 522, 528-36, 80 L.Ed.2d 565, 104 S.Ct. 1970 (1984) that:

*"We remain steadfast in our conclusion, nevertheless, that Congress intended § 1983 to be an independent protection for federal rights and find nothing to suggest that Congress intended to expand the common-law doctrine of judicial immunity to insulate federal or state judges completely from federal collateral review. We conclude that judicial immunity is not a bar to prospective injunctive relief against a judicial officer acting in her judicial capacity."*

27. Plaintiff Ofer, by himself and through his wholly owned entities, have been harmed by the Defendants Isicoff, as they have used the office granted to her by the Federal Government and acted under color of law to deprive Ofer of his rights to property guaranteed under the Fifth and Fourteenth Amendments. The actions taken by Defendant Isicoff was induced by Bribes and other financial benefits. Plaintiff Ofer's criticisms of Defendant Isicoff were expressions which are protected by the First Amendment to the United States Constitution and made applicable to the States via the Fourteenth Amendment.

28. The punishment, theft and threats by Defendant Isicoff for Plaintiff Ofer's lawful rights, grossly violated her rights. Because of the deprivation of his use and ownership of the Properties, Plaintiff Ofer has suffered monetary damages via his inability to collect rent and sell his Properties.

29. With the active cooperation of defendant Isicoff, the other party is merely trying to extort from me \$18M, by threatening me to forge more QCDs of my properties. The Judge is fully aware that the FBI is investigating herself and the other party, regarding this and other numerous cases. In brief, the other party bought shares of an LLC for \$5 (Five Dollars) and claimed that they own a \$18M property (Drexel). Yes, Judge Isicoff awarded her partners an \$18M building for \$5.00 (five dollars), this never happened in US history. Now Isicoff and her partners are laughing all the way to the Bank, but not for a long time.

**If it sounds unbelievable, it is because it is unbelievable.**

30. However, this is not the purpose of this lawsuit, which is about breaches of my civil rights, free speech, due process, threats and breaches of the constitution by this Judge, and above all, the theft of \$50M worth of my properties using Antisemitism comments by her partners, supported by the defendant. I have never in my life filed a claim or complained about civil rights, free speech or antisemitism, this is the first time that I brought it up.

31. A fair Judicial system is the cornerstone of any democracy, this does not seem to be the case here.

At trial, I'll subpoena all emails and other communications between this Judge, and the other party. I'm in possession of other evidence which I'll produce at trial.

Plaintiff received physical threats from people sent by Isicoff and her partners. In addition, shots have been fired at Plaintiff's Rolls Royce Cunning SUV, all windows were smashed and had to be replaced.

32. Plaintiff owns substantial assets and believes that Defendant and her partners are targeting me for personal gain. Their communications (which I will be seeking via discovery) will show it, I'm already in possession of some of the disturbing communications. Plaintiff has worked for some of the largest companies all over the world, including Accenture (biggest software house in the world) and British Airways in London, as an IT consultant and have never experienced **Anti-semitism**, but the facts as outlined herein show that Defendant conduct is based on **Anti-semitism** (I am Jewish and a son of Holocaust survivors). I was born and raised in Israel, my parents are of German origin. Plaintiff has a worldwide reputation as an IT expert and was regularly invited by IBM to lecture in their conferences all over the world. I started my real estate investments in London, while still working for British Airways.

#### **PROCEDURAL BACKGROUND**

33. I filed for chapter 11 with DREXEL in March 2022, due to clear corrupt activities by Judge Carlos Guzman. Defendant Isicoff has awarded my building which had no mortgage, worth \$18M to the other party for \$5.00 (Five Dollars).

34. Defendant Isicoff ignored legal recording where the other party implicated Judge Laurel Isicoff with

their criminal activities. The defendant threatened me not to use or give the recording to anyone, this was clear extortion.

35. Any impartial Judge, when realized what the content of the recording is, would have immediately ordered an immediate evidentiary hearing, not Judge Isicoff; she threatened me not to use it and that I committed a felony by causing the recording to take place, despite knowing it took place in a public place, which is legal, let alone that the FBI had a copy of the recording (it's a video). This was a clear admission of her corrupt actions in her conspiracy to steal \$50M. By threatening me not to mention or use the recording, knowing her name is mentioned in it, is an extortion, 2nd degree felony. A few months later she agreed to listen to the tape and confirmed she can hear her name, but she can't hear 'Grand Theft'. I responded that everyone, including the FBI, can hear 'Grand Theft', I offered to let her have a transcript prepared by the FBI of the recording. She responded on the record, I'll not read it.....I said you'll read it now or in your trial, **but you'll**. Any Judge hearing their name mentioned in a recording by the other party, before the case was even filed, would recuse themselves, even just for the perception of any wrong doing.....The defendant 'solved' it in a different way, by threatening me not to use it.

36. The same applies to the **Antisemitic Affidavits**, she threatened me not to mention or show it to anyone. **Anti Semitism** is a serious criminal offense, let alone that it reflects her conspiracy with the other party to steal \$50M. I'm told by one of America's most prominent Lawyers, Alan Dershowitz, that

a Judge who is implicated with Anti Semitism, by either advocating it, protecting those who made these hate comments or spreading it, must step down as a Judge and face criminal prosecution, not just recusing herself. Mr. Dershowitz closely follows this case and is aware of all the details. The Anti Defamation League (ADL) is also involved and intends to take over this case. I know that 2 Senators also aware of this case, I will not elaborate on who informed them about this case. The most outrageous point with the Anti Semitic affidavits is the fact that the defendant refused to instigate any investigation,

call for an evidentiary hearing and report the perpetrators to the Florida Bar, the FBI and to the State Attorney, she did nothing, just laughed. Defendant will not laugh for much longer.

37. The fact that a Federal Judge is protecting and helping those involved with Anti Semitism, makes this case one of the worst Anti Semitic cases in US history. I do not like my name mentioned by the media, although my name is frequently mentioned in connection to my businesses in NY and Miami, so I didn't seek to get the media involved, in fact I objected to it. However, it gets to a point that it is inevitable that this case will be heavily covered by the media. Defendant Isicoff knows the consequences and the evidence in my possession, she can't recuse herself as her 'partners' will quickly turn against her, these are notorious criminals, very dangerous people.

38. In the case of 942 Penn, the trustee and his lawyer have confirmed to a third party that Isicoff will sign any order they submit, they tried to blackmail me saying I've no chance with Isicoff. A retired BK Judge, Judge Paul Hyman, who conducted the mediation, told me privately during a break that I need to quickly get out of Court, you can see the Trustee is stealing all your money. He added that there was nothing he could do as the Trustee has the power to settle everything regardless of what he says.

39. The lawyer I retained in front of Isicoff, Mark Roher (I didn't know of any reputable BK Lawyer), has stolen \$45K form my CC, by going on a shopping spree forging my signature. I gave him the CC number in a restaurant, I put the CC on the table, I didn't realize he put it in his pocket, I only realized after he had stolen \$45K within a month. His days as a practicing Lawyer are numbered, for this and other reasons. This will mandate a new trial according to my Lawyers.

#### **JUDGE ISICOFF IS NOT ENTITLED TO JUDICIAL IMMUNITY**

39. This suit is being brought in accordance with *Harper v. Merckle*, 638 F.2d 848 (5th Cir. Unit B), cert. denied 454 U.S. 816, 102 S.Ct. 93, 70 L.Ed.2d 85 (1981), which held that the doctrine of judicial immunity does not apply when:

*"...[A] judge has acted out of personal motivation and has used his judicial office as an offensive weapon to vindicate personal objectives.... These nonjudicial acts, to state the obvious, are not cloaked with judicial immunity from suit under s 1983."*

40. The U.S. Supreme Court stated in *Pulliam v. Allen*, 466 U.S. 522, 528-36, 80 L.Ed.2d 565, 104 S.Ct. 1970 (1984):

*We remain steadfast in our conclusion, nevertheless, that Congress intended § 1983 to be an independent protection for federal rights and find nothing to suggest that Congress intended to expand the common-law doctrine of judicial immunity to insulate state judges completely from federal collateral review. We conclude that judicial immunity is not a bar to prospective injunctive relief against a judicial officer acting in her judicial capacity.*

41. Judge Isicoff's actions outlined in this Complaint violate my constitutional rights and civil rights of due process and free speech and are not "judicial acts" and are not subject to judicial immunity. In addition, defendant Isicoff used her Judicial office for her own financial interests and gain. The US as a leader of the free world, Courts, Federal Courts in particular, must rule according to the rule of Law, and not based on financial benefits of a Judge. The US isn't a 3rd world country, far from it.

In certain countries, Jews often pretend they're not Jewish, for fear of their life. Judge Isicoff's threats not to discuss the **Anti Semitic affidavits** is an attempt to do the same.

42. Judge Isicoff is Jewish, clearly the color of money has blinded her, as this case involves a lot of money and assets in the form of real property.

**COUNT I: § 1983 RETALIATION FOR FIRST AMENDMENT PROTECTED FREE SPEECH AGAINST DEFENDANT JUDGE LAUREL ISICOFF**

43. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 42 *infra*.

44. Defendant Judge Laurel Isicoff personally, maliciously, and under color of federal and state law deprived Plaintiff of Plaintiff's rights, including property rights, right to appeal her decisions, under the First Amendment to the United States Constitution, which are secured through the Fourteenth Amendment, by maliciously retaliating against Plaintiffs for Plaintiffs' exercise of the constitutional right of free speech to protest against the Defendants' unconstitutional actions peacefully without

interfering with the operations of the Court.

45. Both monetary and injunctive relief are appropriate to compensation and protect Plaintiff as the only safeguard against further violation of his Free Speech rights under the First Amendment.

12

46. Defendant's cooperation and spreading **Anti Semitism**, as supported on the record, meant to mentally injure the plaintiff and threaten him. As above, when the defendant ordered the plaintiff not to mention or show the **Anti Semitic** Affidavits. The Antisemitic affidavits are the worst sort of Antisemitism, it calls for confiscation of Jews properties, as Jews are always rich.....When such comments are endorsed by a Judge, the legitimacy of the Court system is coming into question.

47. In depriving Plaintiff of these rights, Defendants committed these unlawful violations under color of federal and state law in bad faith and with malicious purpose in reckless, wanton, and willful disregard of Plaintiffs' human, safety, and property rights.

48. This deprivation under color of state law is actionable under and may be redressed by Title 42 U.S.C. §1983.

WHEREFORE, Plaintiff Ofer prays this Honorable Court for the following relief as against Defendant Isicoff:

- a. Monetary damages in the amount of \$40M (Forty Million) for damages caused to the plaintiff's health as a result of Defendant's threats to Plaintiff not to mention or show the Anti Semitic affidavits. A neurologist will testify as to the health damages caused to the Plaintiff.
- b. Entry of a mandatory injunction directing Defendant Isicoff to upload to the docket the recusal motion and rule on it and also force the defendant to comply with the plaintiff's public request for information. By refusing to upload and rule on the recusal motion, and to other motions, defendant is depriving the plaintiff from his constitutional rights of appeal.

- c. Monetary damages in the amount of \$500K for defendant's threats to the Plaintiff that he can't discuss or make any use of the legal recording implicating the defendants with her partner's criminal activities.
- d. Defendant's threats in connection with the recording designed to facilitate the theft of three properties belong to the plaintiff worth \$40M. Plaintiff is claiming damages of \$50M for the theft of his properties worth \$40M and other damages, such as loss of rent, etc, in the amount of additional \$10M, total of \$50M.
- e. Such other and further relief as the Court deems just and proper.

13

**COUNT II: § 1983 CLAIM OF DEPRIVATION OF PROPERTY WITHOUT DUE PROCESS AS TO ALL DEFENDANTS**

49. Paragraphs 1 through 48 are realleged and incorporated herein by reference. The Fourteenth Amendment prohibits actors from depriving an individual of property rights without due process of law.

50. The actions of Defendant Isicoff were undertaken under color of federal and state law. Plaintiff has fundamental property and liberty interests in acquiring and maintaining his ownership of his properties, including 1560 and 1568 Drexel Avenue and 942 Pennsylvania Ave. 51. Defendants have violated Plaintiff's federal and state due process rights by taking control of his properties in violation of federal and state law.

52. Defendant has violated plaintiff federal and state rights, including constitutional rights, against discrimination on the grounds of race, religion, free speech, due process and the right to appeal her decisions.

53. Defendants' interference with Plaintiff's fundamental rights is unconstitutional.

WHEREFORE, Plaintiff Ofer prays for the following relief from this Honorable Court as

against Defendant Isicoff:

- a. Monetary damages in the amount as specified above in A, C & D, \$500,00, \$40M, 50M, total of \$90,500,000.00
- b. Entry of a mandatory injunction directing Defendant Isicoff to upload and rule on the recusal motion and to comply with Plaintiff's Public Request for Information; and c. Such other and further relief as the Court deems just and proper.

14

**COUNT III (42 U.S.C. § 1982) AS TO DEFENDANT**

54. Paragraphs 1 through 53 are realleged and incorporated herein by reference.

55. During the proceedings as the presiding judge, Defendant Isicoff made disparaging remarks about Jews.

56. Plaintiff is the son of Holocaust survivors and is Jewish. Section 1982 of Title 42 of the United States Code provides: "All citizens of the United States shall have the same right, in every State and Territory, as is enjoyed by white citizens thereof to inherit, purchase, lease, sell, hold, and convey real and personal property."

57. Federal courts have applied Section 1982 to situations involving discrimination against Jews. In Shaare Tafila Congregation v. Cobb, 481 U.S. 615 (1987) the Supreme Court held that Congress legislated to protect Jews under 42 U.S.C. § 1982.

58. The actions of Defendant Isicoff were undertaken under color of Federal and State law and were meant as intentional discrimination against Plaintiff Ofer as a Jew.

59. Plaintiff has a fundamental property and liberty interests in acquiring and maintaining his ownership of his properties, either individually or through artificial entities, including the Properties. 60. Defendant have violated Plaintiff's federal due process rights by confiscating his properties and

preventing him from appealing the defendant's rulings, in violation of the law.

61. This deprivation under color of state law is actionable under and may be redressed by Title 42 U.S.C. §1983.

WHEREFORE, Plaintiff RAZIEL OFER prays for the following relief from this Honorable Court as against the Defendant Isicoff:

15

- a. Monetary damages in the amount of \$90.5M as per above A, C, & D.
- b. Entry of a mandatory injunction as above.
- c. Such other and further relief as the Court deems just and proper.

**COUNT IV (42 U.S.C. § 1981) AS TO ALL DEFENDANTS**

62. Paragraphs 1 through 61 are realleged and incorporated herein by reference. 63. Defendant' actions were sufficiently pervasive and severe so as to create a hostile environment and discrimination based on Plaintiff's race.

64. In addition to violating his civil rights, Defendants' actions interfered with Plaintiff's right to peaceably use and enjoy his property.

65. Defendant' actions were sufficiently pervasive and severe so as to create a hostile environment based on race in violation of Plaintiffs rights to make and enforce contracts on an equal basis regardless of race under 42 U.S.C. § 1981.

**DEMAND FOR JURY TRIAL**

66. Plaintiff Raz Ofer demands a trial by jury on all issues and claims so triable.

/s/Raziel Ofer

Raziel Ofer  
Paramount World Center,  
851 NE 1st Ave, Miami 33132  
DATED: 12/12/2023

Email: raz.ofer2@gmail.com

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed on the this 29<sup>th</sup> day of November, 2023, I sent a copy of this filing to all parties of record.

Respectfully submitted,

/s/**Raziel Ofer**

Raziel Ofer  
Paramount World Center,  
851 NE 1st Ave, Miami 33132  
DATED: 11/30/2023  
Email: raz.ofer2@gmail.com